

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**Caption in Compliance with D.N.J. LBR 9004-1(b)**

DONALD C. GOINS, ESQ. (DCG1005)  
GOINS & GOINS, LLC  
323 Washington Avenue  
Elizabeth, NJ 07202  
Phone: (908) 351-1984  
Fax: (908) 351-1982  
Attorney for the Debtor

In Re:  
Peter Luna,

Case No.: 21-18799  
Judge: VFP  
Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**

The debtor in this case opposes the following (**choose one**):

1.  Motion for Relief from the Automatic Stay filed by Nationstar Mortgage, creditor,

A hearing has been scheduled for December 15, 2022, at 10:00 am.

Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

Certification of Default filed by \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

Payments have been made in the amount of \$ \_\_\_\_\_, but have not been accounted for. Documentation in support is attached.

Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

Other (**explain your answer**):

I am looking for an opportunity to catch up on my mortgage payments. I am able to make at least one payment within the next ten days and I can make another payment to accompany the funds I have in suspense to make another payment. I was making the lower payment of \$2,931.55 because that was the payment amount specified in my trial modification I was in before my loan was transferred

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 12 / 13 / 2022

/s/ Peter Luna  
Debtor's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.